



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

December 29, 2020

Mr. Kurt Thiede
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3950

Re: Section 172 and 182 Serious Classification
Requirements for Indiana's Portion (Lake and
Porter Counties) of the Chicago-Naperville, IL-IN-
WI, 2008 8-Hour Ozone Nonattainment Area

Dear Mr. Thiede:

Pursuant to Sections 172 and 182 of Clean Air Act (CAA), the Indiana Department of Environmental Management (IDEM) is submitting amendments to the Indiana State Implementation Plan (SIP) for areas designated as "nonattainment" and classified as "Serious" under the 2008 8-hour ozone National Ambient Air Quality Standard (NAAQS). These amendments apply to Indiana's portion (Lake and Porter counties) of the Chicago-Naperville, Illinois-Indiana-Wisconsin (IL-IN-WI) nonattainment area.

Indiana hereby requests review and approval of the following submittals that fulfill requirements in Sections 172 and 182 of the CAA.

- **Attainment Demonstration and Technical Support Document (Attachment A)**

Indiana demonstrates that the Chicago nonattainment area will meet the standard by the attainment date of July 20, 2021.

The Lake Michigan Air Directors Consortium (LADCO), in cooperation with the states of Illinois, Indiana, and Wisconsin developed updated air quality analyses to support the development of ozone attainment demonstrations. LADCO's modeling results demonstrate that existing emission reduction control measures have improved ozone air quality in the region.

This attainment demonstration and weight of evidence analysis, along with LADCO's modeling analyses, demonstrate that existing permanent and enforceable emission control measures will ensure the area continues to maintain compliance with the standard with an adequate margin of safety.

- **Volatile Organic Compounds (VOCs) Reasonably Available Control Technology (RACT) (Attachment B)**

Indiana certifies that the existing VOC rules contained in 326 Indiana Administrative Code (IAC) 8 satisfy the VOC RACT requirements of Section 182(b)(2) of the CAA. These rules have been approved into the Indiana SIP and no additional measures that are reasonably available will advance the attainment date.

Indiana's VOC RACT demonstration under the moderate classification was fully approved by U.S. EPA on February 13, 2019, effective March 15, 2019.

Indiana certifies that the Negative Declaration for the Control Techniques Guidelines (CTGs) for Fiberglass Boat Manufacturing Materials, submitted June 5, 2009, and approved by United States Environmental Protection Agency (U.S. EPA) on February 24, 2010, is still up to date.

Indiana also certifies that the Negative Declaration for the Oil and Natural Gas Industry CTGs submitted October 25, 2018, and approved by U.S. EPA on January 13, 2019, is still up to date.

- **2020 Nine Percent (9%) Rate of Progress Plan and Three Percent (3%) Contingency Plan (Attachment C)**

These plans fulfill CAA requirements under Sections 182(c)(2)(B) of the CAA. They are based on measures that are already in-place and technology that is already available. The emission reductions that were found were adequate to meet the 9% and 3% requirements and provide for an ample margin of safety. There are not any additional control measures that were identified that would advance the attainment date.

- **Revised 2011 Base-Year Emissions Inventory (Attachment D)**

The revised 2011 base-year emissions inventory updates and replaces the 2011 base-year emissions inventory that was included as Attachment D of the Section 172 and 182 Requirements for Indiana's Portion (Lake and Porter Counties) of the Chicago-Naperville, IL-IN-WI, 2008 8-Hour Ozone Nonattainment Area for moderate classification submitted February 13, 2019, effective March 15, 2019 (84 FR 3711).

This revised 2011 base-year emissions inventory satisfies the state's obligation under Section 182(b)(1)(B) of the CAA and represents a comprehensive and accurate inventory of ozone precursor emissions for Lake and Porter counties.

- **Nonattainment New Source Review (NNSR) Plan (Attachment E)**

Indiana certifies that the existing NNSR rules, found in 326 IAC 2-3 satisfy, and are at least as stringent as, the NNSR SIP plan requirements of 40 Code of Federal Regulations (CFR) 51.165 for the 2008 8-Hour Ozone NAAQS. These rules were approved into the Indiana SIP October 7, 1994, (94 FR 24838) and July 8, 2011, (76 FR 40242) and have not been subsequently amended.

Indiana's NNSR demonstration, under the moderate classification Section 182(b)(4) of the CAA, was fully approved by United States Environmental Protection Agency (U.S. EPA) on February 13, 2019, effective March 15, 2019 (84 FR 3711).

- **Enhanced Vehicle Emissions Inspection and Maintenance (I/M) Testing Program (Attachment F)**

Indiana certifies that the existing Enhanced Vehicle Emissions Inspection and Maintenance (I/M) Testing Program for Lake and Porter counties fulfills the motor vehicle inspection and maintenance requirement of Clean Air Act (CAA) Section 182(b)(4). The program is authorized by state statute Indiana Code (IC) 13-17-5, paid through the general funds, and implemented through rules promulgated by the Indiana Environmental Rules Board at 326 IAC 13. The program was approved effective May 20, 1996 (61 FR 11142).

Indiana's I/M Testing Program demonstration, under the moderate classification Section 182(b)(4) of the CAA, was fully approved by U.S. EPA on February 13, 2019, effective March 15, 2019 (84 FR 3711).

- **Periodic Inventory Emissions Statement (Attachment G)**

Indiana certifies that the current Emissions Reporting Rule, 326 IAC 2-6 satisfies Indiana's obligation under Section 182(a)(3)(B) of the CAA for Lake and Porter counties classified as serious under the 2008 8-hour ozone NAAQS. The Emissions Reporting Rule, 326 IAC 2-6, requires sources located in Lake and Porter counties that emit either NO_x or VOCs equal to or greater than 25 tons per year to annually report their actual emissions to the IDEM.

- **Enhanced Monitoring Program (Attachment H)**

Indiana certifies that the requirements for an enhanced monitoring program remain in place in Indiana's ozone SIP. On March 16, 1994 (59 FR 12168), U.S. EPA fully approved Indiana's SIP revision establishing an enhanced monitoring program in Lake and Porter counties. As such, the program satisfies the state's obligation under Section 182(c)(1) of the CAA for Lake and Porter counties for the 2008 8-hour NAAQS.

- **Public Participation Process (Attachment I)**

IDEM provided a 30-day comment period and opportunity for a public hearing concerning the *Attainment Demonstration and Technical Support Document, Revised Base-Year Emissions Inventory, Nine Percent Rate of Progress and Three Percent Contingency Measure Plans, and Certifications of Indiana's VOC RACT, Nonattainment New Source Review, Vehicle Inspection and Maintenance, Emissions Reporting, and Enhanced Monitoring Programs* for Indiana's Portions of the Chicago, Illinois-Indiana-Wisconsin (IL-IN-WI) 2008 8-Hour Ozone "Serious" "Nonattainment" Area. A public hearing was not requested and there were not any comments received. Please refer to Public Participation Process Documentation (Attachment I) for further information and dates regarding the public participation process.

All of the regulations in the submittals that Indiana is certifying, the *Volatile Organic Compounds (VOCs) Reasonably Available Control Technology (RACT) Indiana's Nonattainment New Source Review (NNSR) Plan, Enhanced Vehicle Emissions Inspection and Maintenance (I/M) Testing Program, Periodic Inventory Emissions Statement, and the Enhanced Monitoring Program*, went through the public participation process and were approved by U.S. EPA before being implemented into Indiana's SIP.

This submittal consists of one (1) hardcopy of the required documentation. An electronic version of the submittal in PDF format that is identical to the hard copy has been sent to Doug Aburano, Chief of U.S. EPA Region 5's Attainment Planning and Maintenance Section and Chris Panos of U.S. Region 5. If you have any questions or need additional information, please contact Brian Callahan, Chief, Air Quality Standards and Implementation Section, Office of Air Quality at (317) 232-8244 or bcallaha@idem.IN.gov.

Sincerely,



Matt Stuckey
Assistant Commissioner
Office of Air Quality

MS/sd/bc/gf/lf

Attachment A: Attainment Demonstration and Technical Support Document
Attachment B: VOC Reasonably Available Control Technology (RACT)
Attachment C: 2020 Nine Percent (9%) Rate of Progress and Three Percent (3%)
Contingency Plan
Attachment D: Revised 2011 Base-Year Emissions Inventory

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Attachment E: Nonattainment New Source Review Plan

Attachment F: Enhanced Vehicle Emissions Inspection and Maintenance (I/M) Testing Program

Attachment G: Periodic Inventory Emissions Statement

Attachment H: Enhanced Monitoring Program

Attachment I: Public Participation Process

cc: Doug Aburano U.S. EPA Region 5 (no enclosure)
Chris Panos, U.S. EPA Region 5 (no enclosure)
Kathleen D'Agostino, U.S. EPA Region 5 (no enclosures)
Matt Stuckey, IDEM-OAQ (no enclosures)
Scott Deloney, IDEM-OAQ (no enclosure)
Brian Callahan, IDEM-OAQ (no enclosure)
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